

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion,
Pursuant to G.L. c.159 §§ 12 and 16, into the collocation
Security policies of Verizon New England Inc. d/b/a
Verizon Massachusetts

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D.T.E. 02-8

REBUTTAL TESTIMONY

OF

EDWARD B. FOX

ON BEHALF OF SPRINT COMMUNICATIONS COMPANY L.P.

MAY 15, 2002

Q. Please state your name and business address.

A. My name is Edward B. Fox. I am Senior Manager – Regulatory Policy, for Sprint Corporation. My business address is 6450 Sprint Parkway, Overland Park, Kansas 66251.

Q. Please describe your educational background and work experience.

A. I received a Masters of Business Administration from Ashland University in 1989 and a Bachelor of Science degree in History from Taylor University in 1972. I am currently employed as Senior Manager – Regulatory Policy for Sprint Corporation. I am responsible for developing state and federal regulatory policy and legislative policy for Sprint Corporation for collocation. I am responsible for coordinating this policy across the multiple business units of Sprint, including its Incumbent Local Exchange Company (ILEC), Wireless, and Long Distance operations that include Sprint's Competitive Local Exchange Carrier (CLEC) operation. I have been in this position since January 2001. I previously served as the Network Policy Manager for Sprint's ILEC operations for four years. Between 1977 and 1996 I held positions in sales, marketing, competitive analysis, and product management within Sprint's local telecommunications division.

PURPOSE OF TESTIMONY.

Q. What is the purpose of this testimony?

A. In this rebuttal testimony, Sprint addresses issues raised by the Department's *Order to Investigate* issued January 24, 2002, and address issues and points raised by Verizon Massachusetts ("Verizon") in its panel testimony dated April 5, 2002. The goal of the Department's Order "is to review Verizon's security procedures and measures that apply to personnel of competing carriers in accessing their collocation sites in Verizon's central offices and other facilities, and to determine which, if any, policies should be strengthened to safeguard telecommunications networks from human tampering and to ensure reliable telecommunications service in Massachusetts."¹ The investigation's issues include (1) the extent and nature of appropriate access by personnel of other carriers to Verizon's central offices facilities for accessing collocation sites; (2) whether cageless collocation arrangements remain an acceptable security risk; (3) the adequacy of security measures implemented in Verizon's central offices and other facilities, focusing on preventive, rather than "after-the-fact," measures; and (4) any other related security issues.² Sprint's testimony addresses these issues and Verizon's Panel Testimony filed in this proceeding.

Q. Is Sprint qualified to speak to both CLEC and ILEC interests?

A. Yes. Sprint approaches the local competition issues raised in this proceeding from the standpoint of a corporation whose operating subsidiaries are on both sides of these issues. Sprint's long-distance subsidiary ("Sprint LD") is in the process of implementing competitive local services, including broadband DSL products that Sprint offers in Massachusetts. Nationally, Sprint LD expects to be collocated in close

¹ D.T.E 02-8, Vote and Order to Open Investigation, rel. January 24, 2002 ("Order"), at 1.

² Order at 7.

to 800 ILEC central offices by the end of this year. In Massachusetts, Sprint is collocated in fifteen ILEC central offices. Sprint also owns a group of incumbent local telephone companies (“Sprint ILEC”) that now comprise the fifth largest ILEC in the nation; these companies are, of course, subject to the rules adopted at both the state and national levels. Sprint is interested in a set of rules that will facilitate CLEC³ entry on economically viable terms and in a fashion that minimizes the ability of other ILECs to artificially increase the costs of entry and to delay the entry process. At the same time, Sprint is fully cognizant of the need to implement the local competition provisions of the 1996 Act in a way that is faithful to the limits of the statute and is fair to the legitimate interests of the ILECs. As a result, Sprint’s positions in this testimony reflect its own internal efforts to weigh the needs of CLECs against the legitimate concerns of ILECs in a fashion that reasonably accommodates both sets of interests. This testimony is the product of the same process of weighing CLEC and ILEC interests that the Commission will itself have to undertake in reaching its own resolution of these issues surrounding network security.

Q: Do ILECs have legitimate security concerns from access to their Central Offices by personnel of other carriers?

A: Yes. As stated above, Sprint operates as an ILEC in 18 states serving over 7 million access lines and also has hundreds of collocators in its central offices. Sprint can identify with the situations described by Verizon of entry of unauthorized people, access to unauthorized space, missing equipment, intentional and inadvertent damage

³ Although any requesting carrier is entitled to collocate under Section 251(c)(6), for convenience, “requesting carriers” will often be referred to herein as “CLECs”.

to both CLEC and ILEC equipment, and assignment of space. In fact, Sprint LD as a collocator, has even experienced theft of some of its own expensive network equipment. The incident occurred within the last three years in Verizon's Revere office in the middle of the day as some of the Verizon employees watched as the thieves walked out the door with a router approximately two feet in length, fifteen inches in depth and two inches tall. For Sprint to say that ILECs, including Verizon, do not have security issues would be less than truthful as a carrier that is both a collocation user and provider.

Q: Does Sprint believe that Verizon's proposed solution in its Panel Testimony is sufficient to allay Verizon's concerns that they may have inadequate security?

A. No. The entire focus of the investigation is too short sighted and beneficial only to Verizon in Massachusetts. Verizon's view of a security solution is exceedingly myopic and is characterized by preservation of its own interests entirely with no explicit or implicit reference to the interdependency of all carriers. There was virtually no consideration given to the security needs of the CLECs, any mention of how this fits into network security initiatives at the national level, nor any consideration given to the realities of the marketplace and the business needs of the collocators. In pursuit of addressing a legitimate issue, Verizon's entire focus was on how they may make their equipment more secure. Verizon's focus has the affect of driving up the cost and increasing the difficulty of doing business for competing carriers located in their buildings. Sprint does not believe that Verizon's view of a

solution is in concert with Congress's intent of the Telecom Act and is in direct conflict with the FCC's pro-competitive, pro-consumer rule making.

Q: Does Sprint believe that the Department and the interested carriers within Massachusetts should be addressing network security in this forum?

A. No, not in its present form. Verizon in its Panel Testimony, Attachment 2, cites FCC Chairman Michael Powell's comments from an October 2001 press conference. In his comments, Chairman Powell outlined the five specific areas that will guide the FCC's agenda, one of which is Homeland Security. Mr. Powell clearly articulates the goal that "the communications community come together to determine our role in ensuring homeland security." And "[w]e will work with industry to ensure the reliability and security of our nation's communications infrastructure." In these comments, he sees this as the closest of interdependence between carriers in this issue of security. Mr. Powell goes on to say that NRIC will provide leadership and that he will be "work[ing] with other agencies to ensure network protection, reliability and redundancy." Verizon appears to ignore Mr. Powell's spirit of community and interdependence in its recommendation by seemingly focusing only on what's in it for Verizon. This proceeding can only exacerbate the adversarial tone. These issues are best accomplished as national policy or through an industry task force, not through litigation in each of the 50 states.

ACCESS TO ILEC CENTRAL OFFICES BY OTHER CARRIERS

Q: Are Verizon's proposed security solutions applicable only to CLECs or to other carriers that collocate in an ILEC central office?

A. In Verizon's panel testimony, there were approximately 100 direct references to CLECs when referring to carriers who needed to be migrated or accept virtual only collocation, all at their own expense. The CLEC community, which ironically in the majority of scenarios, is totally dependent upon its greatest competitor for its only source of telecommunications services. This group of carriers seems to have been singled out as the only Verizon outside security problem. No mention is made of the other types of carriers who are allowed to have physical collocation under Expanded Interconnection (EIC) Rules⁴ and permitted in Verizon's FCC Tariff No. 11⁵. Nor was any mention made of carriers who may have non-regulated floor space lease agreements, such as ISPs. Sprint has no knowledge that any of these types of collocation arrangements exist with Verizon Massachusetts, and perhaps none do, but in the event there are, does Verizon plan on including other carriers in their migration plan?

Q: Is virtual collocation be a viable option for Sprint?

⁴ Under expanded interconnection, end users, interexchange carriers, and competitive access providers may collocate for the purpose of accessing switched and special access traffic.

⁵ FCC Tariff No. 11, Original Page 28-1; ¶28. "Expanded Interconnection is available to customers in either physical or virtual interconnection arrangements."

A. No. Virtual collocation is risky and may result in very unsatisfactory customer service levels. Once again, with forced virtual collocation, collocators are forced to be totally reliant on their largest competitor for telecommunications facilities and installation and service, performance reporting notwithstanding. Referencing a discovery document,⁶ Verizon states that there are 781 total collocation arrangements with only five being virtual collocations. The remaining 776 collocations are physical. This figure shows that the industry does not want virtual collocation as long as physical collocation is available. Sprint's business requirements assume caged collocation (*e.g.*, SCOPE) and as a distant second choice, cageless. Virtual may be considered as an option only where physical collocation is unavailable, but in those instances, only as a temporary arrangement.

Q: Will curtailing physical collocation in “critical COs” adequately address access to ILECs’ offices?

A: No. No criteria have been established to determine what qualifies as a “critical” CO, and Verizon has not projected which COs are critical.⁷ Congress and the FCC contemplate full and rigorous competition in as many markets as possible as an outcome of the Telecom Act. The “handful” of critical offices are the ones that serve the best markets based upon the criteria listed in the Panel Testimony (p. 39-40) (*e.g.*, critical customers, access line quantity, special services). By restricting Sprint and other carriers to virtual collocation only in these offices, this further removes Sprint and other carriers from providing optimal service and maintaining closer contact

⁶ Verizon response to Conversant 1-1a (Tab 1).

⁷ Verizon response to Sprint 1-23 (Tab 1).

through direct maintenance of our equipment. This idea has little to do with security and everything to do with anti-competitive positioning on the part of Verizon.

Q. What have you concluded after reviewing Verizon's collocation security incidents?

A. I reviewed the documents referred to in Verizon's response to discovery (AG-VZ 1-1).⁸ Based upon my review of these documents, at least 80% of the security violations will not be cured if Verizon were to implement its security measures. 40% of the total incidents involved break-ins, thefts, violations and service interruptions and harm to CLECs, not Verizon. Only 19% of the security violations have anything to do with CLECs having access to the ILEC central office (*e.g.*, 7% of incidents were CLECs wandering/rummaging in Verizon areas, and 12% of incidents were CLECs working on or with Verizon equipment).⁹ Most of these incidents are not network threatening.

CAGELESS COLLOCATION AS A SECURITY RISK

⁸ See Tabs 1 and 2.

⁹ These incidents include: CLEC replacing blown Verizon fuse, working on Verizon equipment (no additional details found), CLEC tapping into phone lines, use of Verizon test equipment, and CLEC removal (and return) of Verizon ground bar.

Q. Is cageless collocation an acceptable security risk?

A. Yes. If cageless collocation were not an acceptable security risk, the FCC's rules would not expressly require it. The FCC's rules provide in relevant part that "[i]ncumbent LECs must allow competitors to collocate without requiring the construction of a cage or similar structure. . . . An incumbent LEC must make cageless collocation space available in single-bay increments"¹⁰ Moreover, the FCC's homeland security initiatives together with adequate enforcement of existing, authorized collocation security measures should further help address any post September 11 security concerns.

Q: Does Verizon's security remedy fit the need?

A. No. In the Panel Testimony pp. 21-22, Verizon states that it has not experienced serious security violations in Massachusetts to warrant the adoption of more stringent measures. Nor has Verizon assessed or quantified the "potential network harm" noted in Verizon's testimony at page 4.¹¹ Verizon's anti-competitive suggestions are a far cry from a reasonable pro-active security approach, especially within a jurisdiction such as Massachusetts where no serious security violation has occurred. Verizon's position is totally inconsistent with the FCC's rules and Verizon's tariffs. For example, Verizon's proposal to secure and segregate collocation facilities noted at page 16 of the Panel Testimony is inconsistent with the FCC's collocation rules,

¹⁰ 47 C.F.R. § 51.323(k)(2).

¹¹ See Verizon's response to Sprint-VZ 1-4 (Tab 1).

which allow for shared collocation cages, cageless collocation and adjacent space collocation.¹²

Q: Does Verizon have the ability to control most all of the situations that they claim that are insurmountable?

A: Yes. Verizon states in its Panel Testimony at pp. 30-32 that “Commingling of Verizon’s and CLEC’s equipment in the same unpartitioned equipment area presents insurmountable security problems.” An example given by Verizon seems to characterize all CLEC employees or vendors as recalcitrants who have no regard for ILEC property because they are untouchable by the same disciplinary authority Verizon has over its own employees. Verizon suggests that although they could restrict a specific CLEC employee from the office, they again are helplessly victimized by the same restricted employee who later returns using someone else’s card or tailgates another entering employee.

Verizon continues by describing a potentially menacing equipment commingling situation that exists because the “equipment deployed by the CLECs looks the same as Verizon’s equipment, which increases the likelihood that CLEC personnel may inadvertently work on the wrong shelf - and directly or indirectly cause a service outage.” Verizon’s solution is to either segment that equipment or declare that virtual collocation to be the answer. If Verizon adequately enforced its collocation policies in the first place, these situations could be managed properly. First, Verizon’s CCOE Tariff, DTE MA No. 17 ¶9.3.5 C. states: “The CLEC is responsible for the

¹² 47 C.F.R. §§ 51.323(k)(1)-(3).

identification of all equipment in its CCOE arrangement. All equipment must be clearly identified with the CLEC's name, emergency reach number, CLLI code and relay rack number. The CLLI code and relay rack number will be assigned by the Telephone Company." If there is confusion about identical looking equipment, the CLEC will have the equipment markers for guides as to where they should work. Second, p. 17 of the Panel Testimony lists a number of security methods that are currently used in Massachusetts collocated sites. One of these methods is the "directional signage and floor markings (*e.g.* floor tape)," which would also help eliminate any equipment confusion.

Q: Are CLEC contractors unqualified?

A: No. Verizon has high technical standards for those contractors who work in their central offices.¹³ Verizon's CCOE tariff (DTE MA No. 17) at 9.3.3. C states: "The CLEC must perform all work using Telephone Company approved vendors. Such vendors must comply with the requirements specified in IP 72201, Network Equipment Installation Standards including providing the Telephone Company with documentation (*e.g.*, drawings and record updates) per the Telephone Company standards prior to service activation." In response to a data request,¹⁴ Verizon stated that it does not "approve or certify" vendors. So as not to spend time quibbling about semantics, Sprint uses this term since Verizon also frequently uses it.¹⁵ The point being made is that any CLEC vendors doing work in the common areas must meet

¹³ Verizon response to Qwest 1-36 and Tab, and Verizon response to Qwest 1-37 (Tab 1).

¹⁴ Verizon response to Qwest 1-38 (Tab 1).

¹⁵ "Verizon approved vendors" Panel Testimony at 11; "Telephone Company Approved Vendors" Tariff No. 17 at 9.3.3.C. and 2.2.2.Q.

certification standards defined by Verizon. Verizon requires any company desiring to become certified must pay for an application and prepare an extensive quality manual that explains how the company works in central offices and how they train employees. Vendors must also pay a third party company to review and, if necessary, aid in preparing the quality manual. Vendors must then still be reviewed on actual work prior to becoming certified by Verizon. If any certified vendor accidentally or otherwise causes problems in the central office, it could lose its certification. In cageless scenarios, the CLEC should only be touching its own equipment and should not be touching even the interface between Verizon and the CLEC.

Q: Does Verizon's deployment of its CCTV resource reflect its concern that cageless collocation is an unacceptable risk?

A: No. Verizon states in its Panel Testimony at p. 17, that it deploys Closed Circuit Television ("CCTV") in COs with unsecured CCOE arrangements or where access to shared facilities is only available by means of unsecured open passage through Verizon's equipment areas. Documentation supplied by Verizon¹⁶ lists 13 offices with CCTV arrangements. When comparing these locations to the list of offices with collocations,¹⁷ only six of these offices have collocators totaling 11 collocators with 11 collocation arrangements in these six offices. According to the above citation, only two offices have CCOE secured collocations, *i.e.* Hopkinton¹⁸ and Pittsfield. Verizon also contradicts itself and claims in another source that Hopkinton is the only

¹⁶ Verizon response to Conversent 1.1b (Tab 1).

¹⁷ Verizon response to Conversent 1 1a, and Verizon response to Allegiance-VZ1-1 (Tab 1).

¹⁸ Hopkinton (HPTNMAHR) was referred to as HOPKINGTON in Verizon's response to Conversent 1-1a and to HOPKINTON in Verizon's response Conversent 1-1b and in Verizon's response Allegiance 1-9 (Tab 1).

CCOE arrangement in Massachusetts that is located in unsecured space and cannot be relocated due to lack of separate and secure space in the CO.¹⁹ Conflicting details notwithstanding, Verizon is complaining about acceptable security risks of cageless arrangements while they've deployed CCTV systems in building with no collocators, and where they are currently deployed, they only monitor an average of 1.8 collocation arrangements per central office, and claim that they have difficulty in keeping pace with security issues. This comparatively lightweight security burden does not seem to be worthy of a proceeding of this magnitude. If Verizon were to re-deploy the CCTV systems into their 13 most populous collocated offices, they would be able to monitor approximately 40% of the total collocation arrangements instead of 1.4% of the arrangements being monitored with CCTV today.

Q: Does Verizon charge a monthly security fee for CCOE collocations?

A: Yes. DTE MA No. 17, ¶5.9.11 allows Verizon to charge a monthly Cageless Security charge of \$196.34 for a 15 square foot equipped bay. CCOE is the only type of physical collocation that requires a security charge. If a CLEC has a small four bay arrangement, it will pay over \$9,400 a year for security. It is unclear what the value is to the CLEC for this money since Verizon has deemed cageless collocation to be an unacceptable security risk. This is the arrangement for which Verizon receives direct payment and has the most problems in managing this part of their collocation security. And, after receiving this money year after year, Verizon has the audacity to suggest that relocation of CLECs to secure areas must be at the CLECs' expense. In

¹⁹ Allegiance 1-9.

comparison to this astronomically high rate for security, Sprint's ILEC division charges approximately \$115 a year for security costs consisting primarily of electronic locking and surveillance camera systems.

PREVENTATIVE SECURITY MEASURES

Q: Will moving CLECs to secured areas be a satisfactory preventative security measure to protect the telecommunications network infrastructure in Massachusetts?

A. No. As stated in the introductory comments at p. 5, the focus of this investigation and Verizon's recommendation are woefully deficient in needing to address the larger overall interdependency of the networks and the common interest of protection from harm. However, the objective of this proceeding is focused only on the well-being of Verizon's network in Massachusetts through protecting it from harm from its competitors. If Verizon were implemented everything it proposed, its network would be only marginally more secure than it is today and every bit as vulnerable to significant network tampering as it was before.

Verizon's flawed security solutions contain serious business and regulatory issues, including significant costs being forced upon the CLEC with no measurable benefit, anti-competitive positioning by Verizon, forced relocation with the possibility of service interruptions to CLEC customers, relinquishing of control of collocation

facilities, restriction of physical collocation from critical offices, discouraging physical collocation in favor of virtual, to name a few.

Q. May Verizon impose security arrangements on CLECs that are more stringent than those that it imposes upon its own employees or contractors?

A. No. The FCC's rules are clear. "An incumbent LEC may only impose security arrangements that are as stringent as the security arrangements that the incumbent LEC maintains at its own premises for its own employees or authorized contractors."²⁰ Verizon may not impose more stringent security arrangements on Sprint or any other CLEC than it imposes upon its own employees or contractors. Verizon's proposed collocation security plan appears to apply only to CLECs, not Verizon's employees or contractors. Accordingly, it is inconsistent with the FCC's rules.

Q. Does Verizon have the authority to control the space allocation within its central offices?

A: Yes. Although Verizon has not been granted unilateral and un rebuttable decision-making power regarding CLEC equipment placement, ILECs do have the final word on where they assign collocators. Verizon in its Panel Testimony at page 34, celebrates its expanded "rights to separate and segregate physically collocated equipment within its premises" as granted by the recent *FCC Remand Order*.²¹ In addition, the *FCC Remand Order* allows ILECs to assign collocation space with

²⁰ 47 C.F.R. § 51.323(h)(2)(i).

²¹ See *Deployment of Wireline Services Offering Advanced Telecommunications Capability*, Fourth Report and Order, CC Docket No. 98-147, FCC 01-204 (rel. Aug. 8, 2001) ("*FCC Remand Order*").

separate entrances. In both cases, there are some reasonable restrictions to be followed. For example, the ILEC may not materially increase CLECs' costs or delays, or impair the quality of service or impose other limitations on the service a requesting carrier wishes to offer, and must not reduce unreasonably the total space available for physical collocation or preclude unreasonably physical collocation within the incumbent's premises.²² These conditions are spelled out in detail in Verizon's Collocation tariffs, D.T.E. MA No. 17, ¶2.1.1.F.(1-4) and G(1-5); and ¶2.2.5.(C)(1-2). For CCOE arrangements, ¶9.2.D. states, "The Telephone Company will designate the floor space location specific for each bay of equipment installed."

Q: May ILECs unilaterally require collocators to relocate once an arrangement is operational?

A: No, not beyond the terms and conditions outlined in the applicable Tariff or Interconnection/Collocation agreement. The FCC is explicit on this topic by not requiring adjacent collocators to move when space becomes available.²³ Accordingly, unless the parties mutually agree, Verizon has no authority under today's regulatory environment to force a collocator to move.

²² 47 C.F.R. §51.323(i) (4) and 47 C.F.R. §51.323(i) (6).

²³ 47 C.F.R. §51.323(k) (3). If physical collocation space becomes available in a previously exhausted incumbent LEC structure, the incumbent LEC must not require a carrier to move, or prohibit a competitive LEC from moving, a collocation arrangement into that structure. Instead, the incumbent LEC must continue to allow the carrier to collocate in any adjacent controlled environmental vault, controlled environmental vault, or similar structure that the carrier has constructed or otherwise procured.

Q. Are Verizon's proposed preventative measures equitable in cost vs. benefit to the CLECs?

A: No. Verizon is looking for a blank check from each collocator to fund its self-serving plan. Verizon has conducted no cost studies for its recommended security plan.²⁴ Verizon has not done any studies regarding thumb print scanner costs.²⁵ If implemented, Verizon's proposed security measures could cost each affected CLEC hundreds of thousands of dollars or more. Verizon, not CLECs, is the cost-causer of the costs to implement its unreasonable security measures that solely benefit Verizon at CLECs' expense, with no defined costs or expense limits.

Q. If Verizon's plan is implemented, will there be ample space for collocators who desire to remain in the office?

A: This is unknown at the present time, but it is highly unlikely that ample space will be available for all collocators. The whole plan contradicts FCC rules that dictate the assignment of space.²⁶ The plan materially increases the CLECs' costs and Sprint anticipates that it will unreasonably reduce the total space available for physical collocation. Verizon has listed the offices and whether or not there is separate space

²⁴ Verizon response to Sprint-Verizon 1-28 (Tab 1).

²⁵ Verizon response to Sprint-Verizon 1-24 (Tab 1).

²⁶ 47C.F.R. 51.323 (f)(7)(A-D). An incumbent LEC must assign collocation space to requesting carriers in a just, reasonable, and nondiscriminatory manner. An incumbent LEC must allow each carrier requesting physical collocation to submit space preferences prior to assigning physical collocation space to that carrier. At a minimum, an incumbent LEC's space assignment policies and practices must meet the following principles: (A) An incumbent LEC's space assignment policies and practices must not materially increase a requesting carrier's collocation costs. (B) An incumbent LEC's space assignment policies and practices must not materially delay a requesting carrier occupation and use of the incumbent LEC's premises. (C) An incumbent LEC must not assign physical collocation space that will impair the quality of service or impose other limitations on the service a requesting carrier wishes to offer. (D) An incumbent LEC's space assignment policies and practices must not reduce unreasonably the total space available for physical collocation or preclude unreasonably physical collocation within the incumbent's premises. *Id.*

for CLECs.²⁷ But there is no detail available as to whether it is space for one rack, or whether all CLECs may be accommodated. Even if every CLEC could comfortably move to separate space at no cost or inconvenience, the objective of preventive security will only be marginally accomplished.

Q: Isn't the FCC addressing telecommunications homeland security issues?

A. Yes. Tab 3 is an excerpt from the FCC's website, www.fcc.gov/hspc/, regarding the FCC's Homeland Security Policy Council ("HCPC"). The mission of the HCPC is to "[a]ssist the Commission in evaluating and strengthening measures for protecting U.S. Telecommunications, broadcast and other communications infrastructure and facilities from further terrorist attacks." A key HCPC policy initiative is to "[p]artner with federal, state and local entities and with the industry to ensure network protection and reliability." The FCC also re-chartered the Network Reliability and Interoperability Council ("NRIC") on January 7, 2002 "to focus on lessons learned and existing vulnerabilities."

Q: What is Sprint asking the Department to do?

A: The Department should disregard Verizon's testimony as not pertinent to the issue of overall network security and interdependence of carriers. Specifically, the Department should reject Verizon's proposed collocation security measures. The Department should also reject Verizon's attempt to impose the costs of such measures on CLECs. The Department should instead partner with the FCC to address collocation security through the federal/state Joint Board or defer to the findings and

²⁷ Verizon response to Qwest 1-11 (Tab 1).

results of the FCC's initiatives on this topic, which should provide a consistent national policy for network security. Alternatively, if the Department decides to proceed with this investigation and not wait for the FCC to address these issues, then it could convene an industry task force to develop recommendations in response to the issues under investigation in this Docket.

Q: Does this conclude your testimony?

A: Yes.